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November 10, 2016

Via ECF

Honorable Ronnie Abrams
United States District Judge
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Jason Galanis et al*
16-cr-0371-4 (RA)

Dear Judge Abrams:

This firm represents defendant Hugh Dunkerley in the above-captioned matter. This letter/motion is respectfully submitted on behalf of Mr. Dunkerley to request that the conditions of his bond be modified by suspending the home confinement condition of his bond between the hours of 6:00 A.M. and 9:00 P.M.

Mr. Dunkerley is at liberty on a \$1,000,000 bond secured by \$200,000 in cash. The conditions of Mr. Dunkerley's bond require him to remain at home on home detention with location monitoring. The supervision and monitoring are being conducted where Mr. Dunkerley resides in the Central District of California.

Mr. Dunkerley is seeking employment and employment opportunities and to be able to spend more time with his children.¹ In order to pursue those goals, I have conferred with the Government with a view towards removing the home confinement and electronic monitoring components of the bond completely. The Government has responded that it would prefer those conditions not be completely removed. As an alternative, the parties have conferred and jointly propose that the bond conditions be modified so that Mr. Dunkerley can be permitted to leave and remain away from his home daily between the hours of 6:00 A.M. and 9:00 P.M. without prior notice to Pretrial Services, but that he must be in his home otherwise.

I have conferred with Officer Barrios, the supervising Pretrial Officer in the Central District of California and she takes no position with respect to this request and defers to the Court and the assigned Pretrial Officer in the Southern District of New York. I have also conferred with Officer Lea Harmon, the assigned Pretrial Officer in the Southern District of New York, and she has advised me that Pretrial Services has no objection to the proposed modification.

¹ Mr. Dunkerley and his wife are divorced and the children reside nearby with their mother.

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In light of the above, I respectfully request Mr. Dunkerley's bond be modified so that when Mr. Dunkerley is at home in California he may leave and remain away from his home daily between the hours of 6:00 A.M. and 9:00 P.M. without prior notice to Pretrial Services, but that he must be in his home from 9:00 P.M. to 6:00 A.M. unless granted permission by his supervising Pretrial Officer.

Thank you in advance for Your Honor's consideration in this matter.

Respectfully submitted,



Joseph A. Grob

cc: AUSA Aimee Hector (via ECF & email)
AUSA Brian Blais (via ECF & email)
AUSA Rebecca Mermelstein (via ECF & email)
Hugh Dunkerley (via email)